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SEP 12 1996

SUBJECT: Request for a Removal Action at Yurgin Motors, Mantua, Gloucester County, New Jersey - **ACTION MEMORANDUM**

FROM: Neil J. Norrell, On-Scene Coordinator
Response and Prevention Branch

TO: Jeanne M. Fox
Regional Administrator

THRU: Richard L. Caspe, Director
Emergency and Remedial Response Division

Site ID No.: HM

I. PURPOSE

The purpose of this Action Memorandum is to request funding to conduct a time-critical removal action described herein at the Yurgin Motors Site, RD 2, Route 45, (Block 273, Lot 24) Mantua, Gloucester County, New Jersey.

On May 20, 1996, the U.S. Environmental Protection Agency (EPA) received a written request from the New Jersey Department of Environmental Protection (NJDEP) to perform a removal action at the Yurgin Motors Site, Mantua, NJ, under the provisions of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) as amended by 42 U.S.C. §9601 et. seq.

The Site consists of an abandoned automotive repair facility located in Mantua, NJ. This action memorandum provides for site security, inventory, sampling, analysis, stabilization, transportation and disposal of all hazardous substances present at the Site.

The Site is not on the National Priorities List (NPL) and there are no nationally significant or precedent-setting issues associated with this Site.

FILE:W/NORRELL:FILE NAME:yurgin.am4

2ERR-RPB-NORRELL:321-4357:REV.9/6:FIN.9/9/96:RUTHANN

2ERR-RPB

NORRELL

2ERRD

MCCABE

4/11

2ERR-RPB

DALTON

2ERRD

CASPE

9/12/96

2ERR-RPB

SPRAGUE

2DRA

MUSZYNSKI

9/13/96

2ORC-NJSFB

KARLEN

2RA

FOX

9/13/96



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

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II. SITE CONDITIONS AND BACKGROUND

A. Site Description

1. Removal Site Evaluation

The Yurgin Motors Site is located at RD 2, Route 45, Block 273, Lot 24, Mantua, Gloucester County, New Jersey. The Site consists of one office/shop building, one collapsed storage building, several office trailers and eight box trailers. The buildings are of wood frame construction and in extremely poor condition. One building has collapsed. The property is approximately 24 acres in size and located in a rural farm/residential area. Several small businesses are located nearby.

Preliminary assessments of the Site, performed by EPA, determined that approximately 100-150 drums, 12-15 compressed gas cylinders, approximately 500 small containers and 8 box trailers with unknown contents are abandoned at the Site. Hazcatting performed during the preliminary assessment revealed the presence of materials that meet the criteria of hazardous waste for the characteristics of ignitability and corrosivity. In addition, some of these materials were determined to be chlorinated organic compounds. All materials located at the Site are in poor condition and evidence of leakage is visible in several locations.

The buildings and property are not secured, and there is evidence of vandalism and public entry. Several areas of the Site show evidence of fires and a small above ground storage tank located near the office/shop building appears to have been used as a stove. The Gloucester County Sheriffs Department reports that persons using the Site as a temporary residence have been removed on several occasions.

Most of the containers located at the Site are in deteriorated condition and many are leaking. The property is not secure and persons entering the Site could be exposed to these materials through direct contact and/or inhalation. Due to the deteriorated condition of the containers and unknown nature of the contents, it is impossible to predict the potential health threats related to acute or chronic exposure to the materials.

2. Physical Location

The Yurgin Motors Site is located at RD 2, Route 45, Mantua, Gloucester County, New Jersey. The Site consists of one office/shop building, one collapsed storage building, several office trailers and eight box trailers. The Site is situated in a rural area that is a mix of small farms, private residences and light commercial properties. The site is bordered by Route 45 on the west, wooded lots on the north and south and an open lot on the east. The nearest residence is located approximately 150 feet to the west. A small farm and 6 residences are located approximately 250 feet to the north. A small strip mall is located less than 1/4 mile to the south.

3. Site Characteristics

The site buildings are of wood frame construction. The buildings are not secured and there is evidence of vandalism and public entry. All structures are in poor condition and one has collapsed. The buildings are located on the western and southern property lines with a heavily overgrown area between them. There is chain link fencing along the western border of the property only. The Site can be readily accessed from all other directions. All utilities are believed to be disconnected.

There are approximately 150 drums located on a sandy area in the northern section of the property. Additional drums are located along the southern property border. The compressed gas cylinders are located in several areas. The box trailers are located along the western and southern property lines.

Most of the property is overgrown with low vegetation, however, there are wooded areas located along the northern and southern borders and in the center of the property.

4. Release or Threatened Release into the Environment of a Hazardous Substance, or Pollutant or Contaminant

Information regarding materials at the Site is based on field analysis and inventories performed during the preliminary assessment. The following is a partial list of hazardous substances identified at the Site:

<u>Substance Identified</u>	<u>Statutory Source for Designation as a Hazardous Substance</u>
Materials exhibiting the Characteristic of Ignitability	RCRA, Section 3001 (As defined in CFR 40, Part 261.21)
Materials exhibiting the Characteristic of Corrosivity	RCRA, Section 3001 (As defined in CFR 40, Part 261.22)

Other materials identified at the Site include acetylene, oxygen, propane, automotive paints, solvents, thinners, waste oils and degreasing agents.

Due to the presence of flammable liquids, corrosives and oxidizers (oxygen), the threat of fire at the facility does exist. Materials are located in several areas of the property including the structures and box trailers. Should a fire occur, it could spread across the facility and involve many types of materials found at the Site.

The potentially toxic fumes created by the uncontrolled combustion of these materials could impact the surrounding residents, possibly necessitating an evacuation and the closure of county roads.

Runoff from rain or fire fighting efforts would carry material across the property and onto the surrounding fields and woodlands. In addition, runoff could enter a small, unnamed stream located to the east of the property. The stream flows to Edwards Run which enters Mantua Creek, and eventually the Delaware River.

5. NPL Status

At the present time, the Site is not on the NPL and there are no efforts underway to include this Site on the NPL.

B. Other Actions to Date

1. Previous Actions

This Site was referred, in writing, by NJDEP on May 20, 1996. Assessments were performed by EPA on May 30, August 14, and September 5, 1996. No previous EPA actions have taken place at this Site.

2. Current Actions

On May 30, August 14 and September 5, 1996, EPA performed preliminary assessments at the site and identified the materials described in this memorandum.

C. State and Local Authorities' Roles

1. State and Local Actions to Date

On March 28, 1996, the Gloucester County Sheriffs Department notified NJDEP of leaking drums at the Site. The NJDEP Bureau of Emergency Response (BER) responded to the Site along with the Gloucester County Health and Sheriffs Departments and confirmed the reported conditions.

On April 24, 1996, NJDEP issued a Field Directive to Mr. Peter Yurgin for the removal of materials abandoned at the property. Mr. Yurgin has informed the NJDEP that the Estate of Ludwig Yurgin, the former owner/operator, does not have the resources to comply with the Field Directive.

On May 20, 1996, NJDEP formally referred the site to EPA.

2. Potential for Continued State/Local Response

Neither the NJDEP or the local government have the resources to perform the removal activities. These organizations will act in a supporting role throughout the removal action.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT,
AND STATUTORY AND REGULATORY AUTHORITIES

A. Threats to Public Health or Welfare

Hazardous substances, pollutants or contaminants presently stored at the Site present a threat to the public health and welfare as defined by Section 300.415(b)(2) of the National Contingency Plan (NCP), in that there is an on-going release and a high potential for additional releases to occur. Many of the materials on the Site are flammable and/or corrosive and present a risk of direct

human contact. Any incompatible materials, if mixed, present the threat of a release and/or fire from chemical reaction.

Hazardous materials at the Site are stored without regard for chemical compatibility. The structures in which they are stored are in extremely poor condition or have collapsed, increasing the chance of a reaction or release. Contact with the materials could present an immediate threat to the individuals involved.

Due to the presence of flammable liquids the threat of fire at the facility does exist. Should a fire occur it could spread across the facility and involve most of the material found at the Site. The toxic fumes created by the uncontrolled combustion of these materials could impact the surrounding residents, possibly necessitating an evacuation and the closure of county roads.

Many of the materials present are unknowns, therefore, the effects of acute or chronic exposure cannot be predicted.

Soil contamination is visible on the property, however, the extent of contamination is not known at this time. The soil, primarily fine and medium grain sand, is expected to have a high rate of permeability. This significantly contributes to the possibility of groundwater contamination. At this time, the percentage of area residences and farms using groundwater for drinking, bathing, cooking or crop irrigation is not known, therefore, it is not possible to accurately determine the impact of potential groundwater contamination.

B. Threats to the Environment

Waste material is leaking from some of the drums and other containers located at the Site. Runoff from rain or fire fighting efforts would carry material across the property and onto the surrounding fields and woodlands. In addition, runoff could enter a small, unnamed stream located to the east of the property. The stream flows to Edwards Run, which enters Mantua Creek and eventually the Delaware River.

Soil contamination is visible on the property, however, the extent of contamination is not known at this time. The soil, primarily fine and medium grain sand, is expected to have a high rate of permeability. This significantly contributes to the possibility of groundwater contamination. At this time, it is not possible to accurately determine the impact of potential groundwater contamination.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from the Site, if not addressed by implementing the response action in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare and the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed Action Description

The objective of the proposed removal action is to eliminate the threat to public health and welfare and the environment caused by the materials abandoned at the Site. The proposed removal action will include:

- i. Securing the Site.
- ii. Stabilization of materials located at the Site.
- iii. Inventory of materials located at the Site.
- iv. Sampling and analysis.
- v. Waste categorization.
- vi. Transportation and disposal of all hazardous wastes in accordance with EPA's CERCLA Off-Site Disposal Policy.

The selected mode of transportation and method of disposal will be based on the analytical data.

2. Contribution to Remedial Performance

The proposed action will contribute effectively to any long term remedial action with respect to the release or threatened release of hazardous substances. This removal action is consistent with any future long-term remedial action undertaken at the site.

3. Description of Alternative Technologies

Alternative technologies will be considered so long as they prove to be cost effective and efficient.

4. Engineering Evaluation/Cost Analysis (EE/CA)

Due to the time-critical nature of this removal action, an EE/CA will not be prepared.

5. Applicable or Relevant and Appropriate Requirements (ARARs)

ARARs within the scope of the project, including RCRA and CERCLA regulations that pertain to the disposal of hazardous wastes, will be met to the extent practicable.

6. Project Schedule

Once funding is approved thru this Action Memorandum the removal action can be initiated immediately. Stabilization, inventory, sampling, analysis and waste categorization of materials located at the site would begin immediately. Transport and disposal would occur shortly thereafter.

B. Estimated Costs

Proposed
Ceiling

1. Extramural Costs:

Regional Allowance Costs:

\$400,000

(Total clean-up contractor costs include labor, equipment, materials, and laboratory disposal analysis)

Other Extramural Costs not
Funded From the Regional
Allowance:

Total; START, including multiplier costs

\$ 70,000

Subtotal, extramural costs

Extramural Costs Contingency
(20% of subtotal, extramural Costs)

\$ 94,000

TOTAL, EXTRAMURAL COSTS
(rounded to nearest \$1,000)

\$564,000

Intramural Costs:

Intramural Direct Costs

\$ 60,000

Intramural Indirect Costs

\$120,000

TOTAL, INTRAMURAL COSTS

\$180,000

TOTAL REMOVAL PROJECT CEILING

\$744,000

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed action or no action could result in the release of hazardous substances into the environment exposing nearby residents and employees of the surrounding businesses to hazardous substances and causing contamination of the soil, groundwater and nearby river system. The unrestricted access to the property could expose individuals entering the property to hazardous materials by direct contact.

VII. OUTSTANDING POLICY ISSUES

None.

VIII. ENFORCEMENT

The On-Scene Coordinator will work with the Program Support Branch, the Office of Regional Counsel, the NJDEP and local authorities in an attempt to locate viable PRPs to recover clean-up costs.

IX. RECOMMENDATION

This decision document represents a selected Removal Action for the Yurgin Motors Site, Mantua, Gloucester County, New Jersey developed in accordance with CERCLA as amended, and not inconsistent with the NCP. This decision is based on the Administrative Record for the Site. Conditions at the Site meet the NCP Section 300.415(b)(2) criteria for a Removal Action.

This Action Memorandum, if approved, will authorize a total project ceiling of \$744,000, with a mitigation ceiling of \$400,000. These estimated cost for this project are within the FY 96 Regional Advice of Allowance.

Please indicate your approval for the Yurgin Motors Site removal Action, pursuant to your authority delegated by Assistant Administrator J. Winston Portor, May 25, 1988, Redlegation Memorandum, Delegation Number R-14-1-A.

Approved: _____

W. M. Fox
Jeanne M. Fox
Regional Administrator

Date: _____

9/13/81

Disapproved: _____

Jeanne M. Fox
Regional Administrator

Date: _____

cc: (after approval is obtained)

J. Fox, RA
W. Muszynski, 2DRA
R. Caspe, 2ERRD
~~H. Sprague, 2ERR-RPB~~
J. Daloia, 2ERR-RPB
C. Peterson, 2ERRD-NJRB
D. Karlen, 2ORC-NJSF
B. Bellow, 2CD
R. Gherardi, 2OPM-FMB
S. Becker, 2ERR-RAB
S. Murphy, 2OPM-GCMB
C. Moyik, 2ERR-PSB
T. Johnson, 5202G
P. McKechnie, 2IG
E. Dominach, 2ERR-RAB
C. Kelly, START
J. Smolenski, NJDEP